

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION  
BUREAU, et al.

Plaintiffs,

vs.

STRATFS, LLC (f/k/a STRATEGIC  
FINANCIAL SOLUTIONS, LLC), et al.

Defendants, and

STRATEGIC ESOP, et al.,

Relief Defendants.

Case No. 1:24-cv-00040-EAW-MJR

**NOTICE OF RECEIVER’S MOTION FOR AN ORDER TO SHOW CAUSE  
WHY RECEIVERSHIP DEFENDANT FIDELIS LEGAL SUPPORT SERVICES, LLC  
AND RELIEF DEFENDANT CAMERON CHRISTO SHOULD NOT BE HELD  
IN CIVIL CONTEMPT**

Moving Party:	Receiver, Thomas W. McNamara
Nature of Action:	Consumer Fraud
Directed To:	Receivership Defendants and Plaintiffs
Date and Time:	As soon as practicable.
Place:	Robert H. Jackson United States Courthouse 2 Niagara Square, Buffalo, New York 14202
Supporting Papers:	Memorandum of Law; Declaration of Alexander D. Wall with attached exhibits.
Answering Papers:	To be filed on schedule as determined by the Court. The Receiver intends to file a reply.
Relief Requested:	An order (1) holding both Cameron Christo (“Christo”) and Fidelis Legal Support Services, LLC (“Fidelis”) in contempt of the TRO and PI; (2) requiring Christo and Fidelis to cooperate immediately and completely with the Receiver, including turning over to the Receiver all Assets and corporate records of Fidelis and the Bush Lake Trust,

turning over control of all business operations of Fidelis to the Receiver (so he can determine which operations can continue to be operated lawfully and profitably), and providing a complete financial accounting of Fidelis and Bush Lake Trust, including all financial transactions by Fidelis and Bush Lake Trust, including all transfers to or from third parties; (3) imposing a fine on Christo individually of \$1,000 per day for every day of noncompliance; (4) holding Christo individually and jointly responsible, along with Blust, for all fees and costs incurred by the Receiver in connection with Fidelis's Motion Challenging the Receiver's Determination that Fidelis is a Receivership Defendant (the "Fidelis Motion"); and (5) holding Christo jointly and severally liable, along with Blust, for costs and fees incurred by the Receiver in connection with the Blust contempt motion.

Grounds for Relief:

This Court's Preliminary Injunction, including Section XIII.B.

Oral Argument:

As Christo, Jason Blust, and Michelle Hinds Gallagher have invoked their Fifth Amendment rights with respect to the Fidelis Motion and Blust Contempt Motion, the Receiver submits that no further evidentiary hearing is necessary regarding this motion. The Court can award the relief sought based on the evidence already before the Court, including the sworn testimony at the evidentiary hearing of January 23-24, 2025 and Receiver's and parties' submissions.

Dated: February 5, 2025

**MCNAMARA SMITH LLP**

By: /s/ Logan D. Smith

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Alexander D. Wall (*Pro Hac Vice*)

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*Attorneys for Court-appointed Receiver,  
Thomas W. McNamara*